



IN THE DRAWINGS

Proposed changes to the drawings are submitted herewith,
with a Submission of Proposed Drawing Changes.

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

The title has been amended as requested in the Office Action.

Fig. 1 has been re-numbered as Fig. 1A. New Fig. 1B is submitted herewith to overcome the objections to the drawings and the section 112, second paragraph, rejections applied to claims 1-30.

The specification has been amended to re-number Fig. 1 as Fig. 1A and to identify new Fig. 1B. No new matter is believed to be introduced by the amendments to the specification.

Claims 1-30 stand rejected, under 35 USC §102(e), as being anticipated by Honma et al. (US 6,649,931). The Applicant respectfully traverses the rejections based on the points set forth below.

The invention defined by independent claims 1, 23, and 27 has a structure in which two chips are bonded/connected together and external access to one of the bonded chips, for example (with reference to the non-limiting specification examples) chip 2 (i.e., the upper chip in Fig. 1B), may only be achieved through external terminals (e.g., P1 and P4) connected to the other chip,

via terminals interconnecting the bonded chips (i.e., chips 1 and 2). Thus, independent, external access to both chips is not possible. The claimed structure makes it possible to reduce the number of connection terminals to the chips and, thereby, reduce the required chip area for receiving the connection terminals and the likelihood of connection failures.

By contrast to the claimed structure, Honma discloses in Fig. 1 a structure in which the back surface of a chip 3 is mounted on the surface of a chip 2 and pads of chips 2 and 3 are independently connected to a substrate 1 by wires. Thus, each of Honma's chips 2 and 3 may be independently accessed through the wires interconnecting the chip to the substrate.

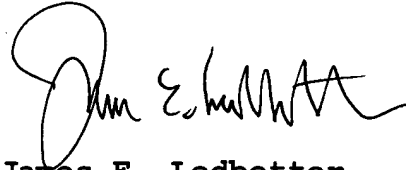
Accordingly, the Applicant respectfully submits that Honma does not anticipate the subject matter defined by independent claims 1, 23, and 27. Therefore, allowance of claims 1, 23, and 27 and all claims dependent therefrom is warranted.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone

the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James E. Ledbetter". The signature is stylized with a large, looping initial "J" and a series of connected, fluid strokes for the rest of the name.

James E. Ledbetter
Registration No. 28,732

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JEL/DWW/att

Attorney Docket No. L8462.03117
STEVENS DAVIS, MILLER & MOSHER, L.L.P.
1615 L Street, N.W., Suite 850
P.O. Box 34387
Washington, D.C. 20043-4387
Telephone: (202) 785-0100
Facsimile: (202) 408-5200